

**ZEITZ & STEIN, L.L.C.**

ROBIN LONDON-ZEITZ, ESQUIRE (RZ 2933)

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Cherry Hill, NJ 08034

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*Attorneys for Defendant,*

*ROYAL TAX LIEN SERVICES, LLC d/b/a CRUSADER LIEN SERVICES*

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

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BEACH CREEK MARINA, INC. :

Plaintiff, :

v. :

ROYAL TAX LIEN SERVICES, LLC :  
d/b/a CRUSADER LIEN :  
SERVICES, COLE LAYER TRUMBLE :  
COMPANY, and TYLER :  
TECHNOLOGIES, INC. :

Defendants. :

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: CIVIL ACTION NO.: 09-2649/KSH

: **NOTICE OF MOTION TO DISMISS**

: Hearing Date: August 17, 2009

TO: Ronald T. Nagle, Esquire  
52 South Street  
Morristown, NJ 07960

**PLEASE TAKE NOTICE** that Royal Tax Lien Service, LLC ("Royal"), by and through counsel, Robin London-Zeitz, Zeitz & Stein, LLC shall, move before the United States District Court for the District of New Jersey, Newark, New Jersey 07102 on August 17, 2009 for entry of an order dismissing this case.

**PLEASE TAKE FURTHER NOTICE** that in support of the within motion, the Royal shall rely upon the affidavit and brief submitted herewith, oral argument of counsel, if any, and such testimony as the Court shall require or allow.

**PLEASE TAKE FURTHER NOTICE** that, objections, if any, to the relief requested must be made in writing and in the form prescribed by the Federal Rules of Civil Procedure, and must be filed with this Court and served upon and received by the counsel to Royal, Robin London-Zeitz, Esquire, Zeitz & Stein, LLC, 201 Barclay Pavilion West, Cherry Hill, NJ 08034 within the time required by the aforesaid rules or as required by the Court.

**PLEASE TAKE FURTHER NOTICE** that, in the event that timely objections are not filed with the Court and served upon the undersigned counsel, the Motion may be deemed uncontested and the Court may, in its discretion, grant the requested relief.

**PLEASE TAKE FURTHER NOTICE** that if timely objections are filed and served upon the appropriate parties, or the Court requires otherwise, the applicant request oral argument.

**ZEITZ & STEIN, L.L.C.**

Dated: July 24, 2009

By:/s/ Robin London-Zeitz  
Robin I. London-Zeitz, Esquire  
*Attorneys for Royal Tax Lien  
Services, LLC*